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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

February 28, 2002

**Ex Parte Submission**

Mr. William Caton  
Federal Communications Commission  
Room TW-B-204  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Joint Application by BellSouth Corporation, et al, for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 02-35

Dear Mr. Caton:

On February 28, 2002, KPMG Consulting, Inc. filed a Revised Interim Status Report with the Georgia Public Service Commission. In order to clarify the record, at the Commission's request, BellSouth is providing the Commission with a file-stamped copy of this Report. The changes made by KPMG to its Revised Interim Status Report have no substantive effect on BellSouth's showing that its performance measures provide a meaningful yardstick for this Commission. For example, on page 1 of the Report, KPMG now explains that Audit I included 420 evaluation criteria, not 417 as previously stated. In addition, in the original report, KPMG reflected the status of FOC Timeliness and Reject Interval for PMR-2 in Audit III and Average Response Interval (Pre-ordering and Ordering) for PMR-4 in Audit III as complete when, in fact, they are in progress. Some of the changes are even more minor. For example, on page 16 of the Report, KPMG changed the written numbers to match the numbers in brackets, a simple typographical error. KPMG has provided (and we are attaching) a redline that shows all changes to the Report. Additionally, KPMG's cover letter to the GPSC lists the exhibits that have been modified.

In its supplemental filing on February 14, 2002, BellSouth relied on KPMG's original Interim Status Report. That filing, and particularly the Supplemental Affidavit of

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Mr. William Caton  
February 28, 2002  
Page 2

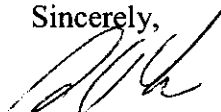
Alphonso Varner, should be read in conjunction with the new report. More specifically, paragraphs 34, 37, 39, 43, 49, 54, and 58 of that affidavit contain figures that have been changed by the new report. Again, none of the changes in the Revised Interim Status Report affects the basis for BellSouth's conclusion that its performance data are reliable.

In addition, in paragraphs 32 and 43 of Mr. Varner's Affidavit, BellSouth inadvertently stated that all 29 Key Measures had been audited in either Audit I or II. The statement should read that 28 of the 29 Key Measures were audited in either Audit I or II. This change does not affect BellSouth's conclusion that its performance data are reliable.

As a courtesy we will seek to provide parties who have participated in this proceeding with a copy of this letter not only by mail, but also by fax and/or email. Also, BellSouth reminds all parties that this filing, like all BellSouth filings in this docket, will be available on the BellSouth website at <http://bellsouthcorp.com/policy/>.

In accord with the Commission's rules governing ex parte communications, I am enclosing two copies of this letter. Please file-stamp and return the additional copy.

Sincerely,



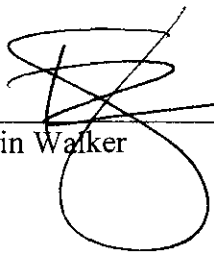
Sean A. Lev

Attachments

cc: Renee Crittendon  
Susan Pie  
Cynthia Lewis  
James Davis-Smith  
Leon Bowles  
Arnold Chauviere  
Qualex

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28th day of February 2002, the foregoing Ex Parte Submission of BellSouth's Errata Filing was sent via first-class mail and email and/or facsimile to all known commenters.



---

Kevin Walker



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EXECUTIVE SECRETARY  
G.P.S.C.

February 28, 2002

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, GA 30334-5701

**RE: Investigation into Development of Electronic Interfaces for BellSouth's  
Operational Support Systems: Docket No. 8354-U**

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of the following documents:

- (1) A Revised Interim Status Report as well as a red-line version of the Interim Status Report;
- (2) V2 Audit III\_PMR 4\_Data Integrity Status Summary
  - a. Average Response Time & Response Interval (P.O. and Ord.) – change to “In Progress;”
  - b. Acknowledgment Message Timeliness and Completeness – change to “In Progress;”
  - c. Change all “Completed in Audit II” to “Completed in Audit I;”
  - d. Change summary totals.
- (3) V2 Audit III\_PMR 2\_Standards\_Status\_Summary
  - a. Change Reject Interval and FOC Timeliness to “Under Review;”
  - b. Change Service Order Accuracy to “Not Started;”
  - c. Change summary totals.
- (4) V2 Audit III\_PMR 5\_Chart Replication Status
  - a. B.1.9.1, B.1.9.2, B.1.9.4 – Change to “In Progress;”
  - b. B.2.34.1.1.1.1 – Change Month I to “M;”
  - c. B.3.1.10.1, B.3.1.10.2 – delete “Completed in Audit II;”
  - d. C.1.3.1 – change to “In Progress;”
  - e. F.12.2.1 – F.12.2.2 – Change to “In Progress.”
  - f. Change summary totals for UNE, LIT and General.

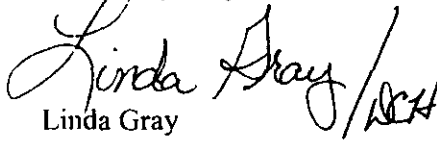
On the attachments, for the ease of the Commission, we only have included the pages with changes.

We request that these documents be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Yours very truly,

  
Linda Gray  
Senior Manager

Enclosures

cc: Parties of Record

## 1.0 Document Objective

In this document, KPMG Consulting, Inc. (KPMG Consulting) provides an interim status report on developments related to the BellSouth-GA OSS Test Master Test Plan (MTP) and Supplemental Test Plan (STP) (Audit I), June, 2000 Interim Metrics (Audit II) and January 2001 Permanent Metrics (Audit III).

## 2.0 Status of ongoing evaluations

### Audit I:

For a complete review of Audit I, see the March 20th, 2001 Final Reports and subsequent status reports. In the GA MTP and STP final reports, KPMG Consulting evaluated 420 evaluation criteria in the Metrics test. The Metrics test included a Performance Measure test component for each functional test area of the MTP including Pre-Ordering, Ordering and Provisioning, Maintenance and Repair, and Billing; along with the following six test segments in the STP for the SQM reports:

- PMR 1 -- Data Collection and Storage Verification and Validation;
- PMR 2 -- Metrics Definition Documentation and Implementation Verification and Validation;
- PMR 3 -- Metrics Change Management Verification and Validation;
- PMR 4 -- Metrics Data Integrity Verification and Validation;
- PMR 5 -- Metrics Calculation and Reporting Verification and Validation; and
- PMR 6 -- Statistical Analysis Assessment.

BellSouth has satisfied 411 of the 420 evaluation criteria for Audit I contained in the MTP and STP Final Reports. The open exceptions associated with the remaining criteria that BellSouth has still not satisfied and that KPMG Consulting is still evaluating are listed below.

**Exception 86 - Percent Provisioning Troubles within 30 days of Service Order Activity** – On Friday, December 28, 2001, KPMG Consulting discussed with BellSouth the discrepancies between the BellSouth-reported values and the KPMG Consulting-calculated values for the BellSouth Retail/CLEC Aggregate SQM reports for September and October 2001. As a result of these discussions, BellSouth determined that some of the instructions in the Raw Data User Manual should be listed in a different order.

BellSouth published an updated Raw Data User Manual on its PMAP web site, which was in accordance with our discussions. BellSouth then

provided KPMG Consulting with the November 2001 Percent Provisioning data (along with the corresponding October 2001 Order Completion Interval data), so that KPMG Consulting could attempt replication on this new data set. The KPMG Consulting-calculated values matched the November 2001 BellSouth-reported values, exactly.

BellSouth provided an updated, amended response to this Exception. Based upon KPMG Consulting's findings, and review of this response, KPMG Consulting is preparing a closure statement for this Exception. (See Evaluation Criteria PMR 5-11-2 which will become satisfied with the closure of Exception 86.)

**Exception 89 - Pre-Ordering OSS Response Interval -** While KPMG Consulting has matched the values reported for the New LENS system, we have not yet matched the values for ROS, RNS and TAG.

KPMG Consulting has received, and is reviewing, the early-stage and raw data for the ROS and TAG systems for the months of September and November 2001, respectively. KPMG Consulting also has received the early-stage data for RNS for September 2001, but awaits the corresponding raw data. BellSouth will also provide an amended response to this Exception. (See Evaluation Criteria PMR 4-1-1.)

**Exception 122 - Ordering metrics - use of interface gateway timestamps vs. legacy system timestamps -** BellSouth currently is implementing a variety of changes to its systems, such that, in the future, BellSouth will use interface gateway timestamps in its calculation of Reject Interval and FOC Timeliness. At this point, BellSouth estimates that interface gateway timestamps are utilized in the relevant metric calculations more than 95% of the time.

BellSouth has indicated that the related updates to the TAG system were implemented on January 5, 2002 as scheduled, and the remaining EDI system updates will be implemented in May of this year. Once BellSouth has notified KPMG Consulting that all system updates are complete, testing will resume. BellSouth will also provide an amended response to this Exception. (See Evaluation Criteria PMR 2-4-2, PMR 2-4-3, PMR 2-5-2 and PMR 2-5-3.)

**Exceptions 136/137 -** KPMG Consulting and BellSouth are currently discussing the data completeness issues relating to raw data files for the Ordering metrics, in particular Reject Interval and FOC timeliness. Focusing on the data for September 6, KPMG Consulting attempted to match the records for these files, first by PON only (to provide a first cut of the analysis). It was determined that the early-stage data set obtained

does not provide all the information necessary to determine which records should be excluded.

KPMG Consulting then repeated our analysis, attempting to match records by OCN/PON/VER. We were not entirely successful. KPMG Consulting has provided BellSouth with lists of discrepancies between the TAG and respective raw data files. BellSouth will provide data from other systems, at the earliest point in which they are recorded, to enable KPMG Consulting to identify exclusions appropriately, and to determine whether the raw data are complete. BellSouth will also provide an amended response to this Exception. (See Evaluation Criteria O&P 7-1-3, O&P 7-2-3, and O&P 7-3-3.)

**Audit II:**

During the evaluation of the original GA test on Performance Metrics (Audit I), the Georgia Commission adopted a set of Interim Measures in June 2000. KPMG Consulting leveraged the work that was underway in Audit I to complete an evaluation of on the Interim Measures (Audit II). Evidence of the leveragability of the work from Audit I to Audit II can be seen in the PMR1 to PMR 6 test sections.

Each PMR test was conducted similarly in Audit I and Audit II, and the results of Audit II are provided under each of the following test sections. The specific similarities are set forth below.

BellSouth has met and satisfied all evaluation criteria for Audit II.

The PMR 5 test for Audit II was specific to the 271 charts that BellSouth produces as the communication vehicle for its state and federal 271 filings. The six test segments of Audit II are:

- PMR 1 -- Data Collection and Storage Verification and Validation;
- PMR 2 -- Metrics Definition Documentation and Implementation Verification and Validation;
- PMR 3 -- Metrics Change Management Verification and Validation;
- PMR 4 -- Metrics Data Integrity Verification and Validation;
- PMR 5 -- Metrics Calculation and Reporting Verification and Validation; and
- PMR 6 -- Statistical Analysis Assessment.

**PMR 1      Data Collection and Storage**

In Audit I, the Test of the Data Collection and Storage Verification and Validation Review evaluated the key policies and practices for collecting and storing raw data necessary for the creation of performance metrics.



The primary objectives of this test were to determine the adequacy and completeness of the key policies and procedures for collecting and storing the performance measurements data.

Audit I results apply to this topic for both existing Service Quality Measurements (SQMs) and for new levels of disaggregation required by the Interim Metrics where the data for the new levels of disaggregation follow the same path as the those previously investigated in Audit I.

For new SQMs, both the procedures followed in, and the tools used to collect and store the data for, the calculation of the reported measures were within scope in Audit II. Therefore the following five (5) Interim Metrics were reviewed, and the evaluation criteria were all satisfied for the PMR 1 test.

- Pre-Ordering – “Service Inquiry with Firm Order” and “Average Response Time for Loop Makeup Information” (KPMG counts manual and electronic LMU as one measure)
- Provisioning - Coordinated Customer Conversions –% Provisioning Troubles Received Within 7 Days of a Completed Service Order
- Change Management - % Change Management Notices Sent on Time and % Change Management Notices – Delay 8 Plus Days

## **PMR 2      Definition Documentation and Implementation**

In Audit I, the Metrics Definition Documentation and Implementation Verification and Validation Review evaluated the overall policies and practices for documenting and implementing metrics definitions. This included policies and practices associated with both CLEC and retail measurements.

The primary objectives of this review were to determine the adequacy, completeness, accuracy, and logic of the performance metrics as documented. Implementation of the definitions in this test covered both the exclusions and business rules applied in the creation of the raw data as well as any exclusions and business rules that were applied in the calculation of the metrics from the raw data.

KPMG Consulting covered the documentation of metric definitions and business rules for 24 existing SQMs in Audit I. Documentation of SQMs not reviewed previously, but included in the Georgia 271 charts, were within the scope of Audit II.

For existing SQMs, where the raw data was of the same format as the data reviewed in Audit I, the implementation of documented business rules and exclusions were covered in Audit I. For new levels of disaggregates, and new SQMs where the raw data was not previously reviewed, the implementation of the business rules and exclusions were within the scope of Audit II.

KPMG Consulting based its evaluations on documentation of SQMs and computational instructions provided by BellSouth. The following 27 metrics were reviewed, and all evaluation criteria were satisfied:

- **Pre-Ordering:**
  - Service Inquiry with Firm Order
  - Average Response Time for Loop Makeup Information (Manual, Electronic)
- **Ordering**
  - Percent Rejected Service Requests
  - Reject Interval
  - Firm Order Confirmation Timeliness
  - LNP – Percent Rejected Service Requests
  - LNP – Reject Interval
  - LNP - Firm Order Confirmation Timeliness
- **Provisioning:**
  - Mean Held Order Interval and Distribution Intervals
  - Percent Missed Installation Appointments
  - Average Completion Interval / Order Completion Interval Distribution
  - Average Completion Notice Interval
  - Coordinated Customer Conversion Intervals
  - Hot Cut Timeliness % Within Interval and Average Interval
  - Coordinated Customer Conversions –% Provisioning Troubles Received Within 7 Days of a Completed Service Order
  - Percent Provisioning Troubles within 30 days of Service Order Activity
  - Total Service Order Cycle Time
  - LNP Percent Missed Installation Appointments
  - LNP Average Disconnect Timeliness
  - LNP Total Service Order Cycle Time

- **Maintenance and Repair**
  - Missed Repair Appointments
  - Customer Trouble Report Rate
  - Maintenance Average Duration
  - Percent Repeat Troubles within 30 days
  - Out of Service > 24 hours
- **Change Management**
  - %Change Management Notices Sent on Time
  - %Change Management Notices Delayed  $\geq$  8 Days

**PMR 3          Change Management**

In Audit I, the Metrics Change Management Verification and Validation Review evaluated the overall policies and practices for managing changes in BLS's production and reporting of metrics. All of the evaluation criteria for the Audit I PMR 3 test were satisfied.

The assumption for Audit II was that the overall policies and practices for managing changes for the new levels of disaggregation was the same as were verified and validated by Audit I; and, therefore, this area was not covered in the scope of Audit II.

In addition, this review was not considered to be applicable to the newly developed SQMs because no changes have yet been made to these new measures.

**PMR 4          Data Integrity**

In Audit I, the Metrics Data Integrity Verification and Validation Review evaluated the overall practices and policies for processing the data used by BLS in the production of the reported performance metrics. The objective of this test was to determine the key procedures for processing the data necessary to produce performance metrics and the integrity of the processed data.

For existing SQMs, where the raw data is of the same format as the data reviewed in the Audit I test, the results of Audit I test satisfied the requirements of Audit II.

For new SQMs, and new levels of disaggregates where the raw data had not been reviewed previously, Audit II relied on reviewing the computer script that extracts the raw data, and a review of the extracted data itself to verify that a) the calculations are performed accurately and b) no records are inappropriately included or excluded from the raw data.

Audit II included 25 of the metrics listed under the Metrics Definition Documentation and Implementation Verification and Validation Review above (less Coordinated Customer Conversions and Average Completion Notice Interval). All evaluation criteria were met and satisfied for the PMR 4 test.

#### **PMR 5          Calculation and Reporting (271 Chart Replication)**

The Calculation and Reporting Validation Review evaluated the processes used to calculate and report the performance measures as requested in the June 6, 2000 GPSC Docket and reported on the 271 Charts.

The objectives of this test were to determine the accuracy of metrics calculations, and to test for consistency between the reported measures and levels of disaggregates and those requested in the June 6, 2000 GPSC Docket.

KPMG Consulting based all of its evaluations on the raw data provided by BellSouth, or raw data extracted directly from the BellSouth early stage systems, and the computational instructions provided by BellSouth.

The test relied on re-calculating the measures for the CLEC-aggregate and retail analogs, using the raw data provided by BellSouth, and reconciling any discrepancies between BellSouth reported values and the KPMG Consulting calculated values.

The Calculation and Reporting Validation Review included six report areas: Resale, Unbundled Network Elements (UNEs), Local Interconnection Trunks (LITs), Operations Support Systems (OSS), Collocation, and General. Typically, the data included the report months of June 2000, July 2000, and August 2000.

A total of 1178 charts were reviewed, with 1178 charts satisfying the evaluation criteria for a 100% match rate. A complete review of the PMR 5 test can be seen in the attached document, V2Audit II\_PMR5\_StatusSummary. All evaluation criteria for PMR 5 have been met and satisfied.

#### **PMR 6          Statistical Analysis Assessment**

The Statistical Analysis Assessment evaluated the processes and statistical methods employed by BellSouth to evaluate parity of service BellSouth offers to the CLECs relative to the level of service BellSouth provides retail customers. The primary objective was to assess the accuracy and validity of these statistical methods.

The activities undertaken to assess the accuracy and validity of the statistical methods employed by BellSouth included a two-pronged approach. First, in order to assess the validity and appropriateness of the application of the BLS tests, KPMG Consulting evaluated whether or not the mean, rate, or proportion test were applied appropriately to the particular measure. Second, KPMG Consulting evaluated the accuracy of the BellSouth reported standard errors for each of the three types of measures.

The basis for Audit II statistical assessment was a random sample of Provisioning and Maintenance Repair charts chosen from all of the available Georgia 271 charts where the benchmark is an equity measure provided by BellSouth. All evaluation criteria for PMR 6 were met and satisfied.

**Exception 129**

All issues identified in Exception 129 have been resolved and satisfactorily. An amended Exception 129 to reflect the closures will be issued.

**Audit III:**

After the evaluation of the original GA test on Performance Metrics (Audit I) and the audit on Interim Measures (Audit II), the Georgia Commission ordered a set of permanent measures in January 2001. KPMG Consulting leveraged the work that had been completed in Audits I and II to undertake a third audit on the Permanent Measures (Audit III). As can be seen in the following PMR 1 to PMR 5 test sections, those PMR tests for Audit III are being conducted similarly to the Audit I and Audit II tests, and the results and current status of Audit III are provided under each of the appropriate test sections. In Audit III, PMR-6 and PMR-7 apply to SEEMs.

Audits I and II were thoroughly performed and establish a baseline for the review of Audit III since BellSouth continues to use the same systems to produce performance metrics. These systems have been changed over time to the extent necessary to produce new measures and different levels of disaggregation from various sets of metrics that have been ordered by the GA Commission. For a more detailed review of the specific statuses and issues at the metric and disaggregate levels for Audit III, please refer to the attached spreadsheets as referenced in each test section.

**PMR 1      Data Collection and Storage**

As part of Audit III, KPMG Consulting currently is retesting PMR1 by requesting re-verification of documentation and interview summaries to confirm that they are still applicable and correct. Except for capacity management, all tests pertaining to other PMR1 criteria have been completed, and the evaluation criteria satisfied

KPMG Consulting continues to verify documentation and information specifically relating to BellSouth's capacity and capacity plans for collecting and storing data for both the automated and manual processes used for the performance metrics reporting.

This test is currently 90% complete.

## **PMR 2          Standards and Definitions**

KPMG Consulting continues to evaluate metrics definitions and standards documentation, and to review the related policies and practices, through review of the BellSouth OSS Testing Service Quality Measurements Plan, Georgia Performance Metrics and BellSouth's PMAP reports. Three months of reports will be reviewed.

KPMG Consulting continues to examine the SQM document to verify that the measurements accurately represent BellSouth's SQM reporting. KPMG Consulting also is verifying that the PMAP reports are complete and consistent in accordance with the guidelines, and that the reports are available to BellSouth's wholesale customers on a consistent basis. Lastly, KPMG Consulting continues to verify that BellSouth publishes the monthly reports on time.

As of December 28, 2001 the status for each month was:

### **Month I**

- Thirty (30) metrics were completed in Audits I and II, and are thus complete.
- Of the remaining forty four (44) metrics:
  - Thirty-seven (37) have been reviewed, met the evaluation criteria and are considered complete.
  - The three (3) Collocation metrics (Average Response Time, Average Arrangement Time and Percent of Due Dates Missed) and FOC Timeliness and Reject Interval are still being reviewed.

- Two metrics, Coordinated Customer Conversions, Average Recovery Time, and Service Order Accuracy, have not been started.

Month I is 91% complete.

#### **Month II**

- Thirty (30) metrics were completed in Audits I and II.
- Of the remaining forty four (44) metrics:
  - Thirty-three (33) have been reviewed, met the evaluation criteria and are considered complete.
  - Nine (9) metrics (FOC and Reject Response Completeness, Percent Database Update Accuracy, two Bona Fide/New Business Requests, FOC Timeliness and Reject Interval, Average Response Time, Average Arrangement Time and Percent of Due Dates Missed are currently under review.
  - Two metrics, Coordinated Customer Conversions, Average Recovery Time, and Service Order Accuracy have not been started.

Month II is 85% complete.

#### **Month III**

- Month III will be started upon completion of Month II testing.

A complete review of the PMR 2 test can be seen in the attached document, *V2Audit III\_PMR2\_Standards\_Status\_Summary*.

### **PMR 3      Change Management**

KPMG Consulting is retesting Audit I PMR3 from the STP by requesting re-verification of documentation and interview summaries to confirm that they are still applicable and correct.

As a result of our retesting, KPMG Consulting is in the process of issuing draft exceptions on the following issues:

- KPMG Consulting has discovered that BellSouth is not adhering to the documented metrics change control process for tracking changes in TeamConnection. KPMG Consulting reviewed BellSouth's TeamConnection reports reflecting the status of requested changes. Seven (7) changes with the

highest possible priority settings were observed as having been implemented, but had remained opened for over seven months. KPMG Consulting identified this as an inconsistency between the process and documentation.

- KPMG Consulting discovered that BellSouth has no documented process or control group for monitoring open change requests in TeamConnection. KPMG Consulting discovered that BellSouth has six TeamConnection changes for Features with the highest Feature priority setting, and one TeamConnection change for a Defect with the highest Defect priority setting, which have been open for over seven months. BellSouth's documentation indicates that the highest Feature priority setting and the highest Defect priority setting should be assigned to changes such as those mandated by regulatory orders. The fact that Features with the highest priority setting, and Defects with the highest priority, have remained open for over seven months could indicate that BellSouth is either not tracking the closure of the changes, is not working appropriately to resolve the changes, or has incorrectly assigned the priority setting.
- KPMG Consulting has discovered that BellSouth posted raw data to the PMAP website without simultaneously posting the corresponding release of the Raw Data User's Manual (RDUM).

The work necessary to complete the PMR3 test involves the continued monitoring and retesting of the proposed Exceptions to bring them to resolution.

This test is currently at 85% complete.

#### **PMR 4      Data Integrity**

The Metrics Data Integrity Verification and Validation Review is being conducted for the nineteen (19) new metrics, and forty-one (41) metrics with new levels of disaggregations added to the Georgia SQM since the completion of the Audit I and Audit II Tests.

The analysis process includes comparison of data from the Legacy/Source Systems to the data captured in Barney Snapshot tables; and, the comparison of the Barney Snapshot tables to the PMAP Staging Tables. Defined business rules are applied to the data in the PMAP Staging tables, and the results compared to the NODS Reporting Tables.

The following is the current status of the data integrity testing:



- One (1) metric (LSR Detail Report) does not require calculations. The report is reviewed by another domain.
- Thirteen (13) metrics were reviewed in Audits I and II.
- Twenty-three (23) metrics reviews have been started:
  - Six (6) have met the evaluation criteria and are considered complete.
  - Reviews of seventeen (17) metrics are in still in progress.
- Review of thirty-seven (37) metrics have not been started.
- Draft Exception 186 was issued December 28 and states that BellSouth incorrectly excludes data between the BARNEY Snapshots, and NODS stages of the PMAP process. The excluded data are inputs into the calculation of the fully mechanized and partially mechanized orders for the "Ordering: Firm Order Confirmation (FOC) and Reject Response Completeness" Service Quality Measurement (SQM) for June 2001 data.

Of the 37 metrics where testing has been started in Audit III, or completed in Audits I or II, 20 (or 54%) have satisfied the evaluation criteria and are complete. A complete review of the PMR 4 test can be seen in the attached document, *V2Audit III\_PMR4\_Data Integrity Status Summary*.

KPMG Consulting is in the process of issuing draft exceptions on the following issues:

- BellSouth does not properly construct the processed data used to validate certain Ordering Service Quality Measurements (Ordering: FOC timeliness {non-trunks} and Reject interval). (September 2001).
- BellSouth incorrectly excludes data between Barney snapshots and NODS stages of the PMAP process that go into the calculation of the fully mechanized and partially mechanized orders for the "Ordering: Percent Rejected Service Requests (Non-Trunks)" Service Quality Measurement (SQM) for June 2001 data.
- BellSouth incorrectly includes multiple instances of the same Service Order Number in NODS for the "Provisioning: Average Completion Notice Interval (ACNI)" Service Quality Measurement (SQM) for November 2001 data.

## **PMR 5      Replication – SQM Reports**

The replication for the SQM reports is a three step process. First, the SQMs are calculated using the raw data provided by BellSouth. Second, a comparison of the values are made to the SQM values reported by BellSouth. Third, the levels of product disaggregation BellSouth reported is compared to those it listed in its SQM plan. Three months of replication will be completed for each metric.

By means of this three step process, KPMG Consulting is able to assess the accuracy and completeness of reported performance measure disaggregation levels, and determine whether there is agreement between KPMG Consulting-calculated and BellSouth-reported SQM values. For the Audit III, there are 60 metrics to be reviewed.

The current status of the SQM Report replication is:

### **Month I**

- Fourteen (14) metrics were completed and met the evaluation criteria in Audit II.
- As part of Audit III:
  - One (1) metric (LSR Detail Report) does not require calculations. The report is reviewed by another domain.
  - Three (3) metrics currently do not have values published and are considered placeholders for future reporting.
  - Thirty (30) metrics have met the evaluation criteria and are considered complete.
  - Twenty two (22) metrics have non-matched values and will require retesting.
  - Four (4) metrics have not been started.

### **Month II**

- Fourteen (14) metrics were completed and met the evaluation criteria in Audit II.

- As part of Audit III:
  - One (1) metric (LSR Detail Report) does not require calculations. The report is reviewed by another domain.
  - Three (3) metrics currently do not have values published and are considered placeholders for future reporting.
  - Twenty eight (28) metrics have met the evaluation criteria and are complete.
  - Three (3) metrics have non-matched values and will require retesting.
  - Twenty five (25) metrics have not been started.

**Month III**

- Fourteen Metrics were completed and met the evaluation criteria in Audit II.
- As part of Audit III:
  - One (1) metric (LSR Detail Report) does not require calculations. The report is reviewed by another domain.
  - Three (3) metrics currently do not have values published and are considered placeholders for future reporting.
  - Twenty seven (27) metrics have met the evaluation criteria and are considered complete.
  - One (1) metric has non-matched values and will require retesting.
  - Twenty eight (28) metrics have not been started

This test is currently 52% complete. A complete review of the PMR 5 for the SQM reports can be seen in the attached document, *V2Audit III\_PMR5\_SQMs By Metric\_Status\_Summary*.

There are currently five (5) Exceptions related to the SQM reports. BellSouth has responded to each one, and KPMG Consulting is currently retesting. These Exceptions are:

- Exception 138  
KPMG Consulting could not replicate the values in the "Ordering: Acknowledgement Message Completeness" Service Quality Measurement (SQM) report for the CLEC Aggregate (July 2001).
- Exception 139  
KPMG Consulting could not replicate the values in the "Provisioning: Coordinated Customer Conversions" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001).
- Exception 140  
KPMG Consulting cannot replicate the values in the "Provisioning: Hot-Cuts Troubles within 7 Days of the Service Order Completion" Service Quality Measurement (SQM) report for the CLEC Aggregate (September 2001).
- Exception 141  
KPMG Consulting cannot replicate the values in the "Ordering: Acknowledgement Message Timeliness" Service Quality Measurement (SQM) report for the CLEC Aggregate (August 2001).
- Exception 142  
KPMG Consulting could not replicate the values in the Provisioning: Jeopardy Interval & % Jeopardy Non Mechanized" Service Quality Measurement (SQM) report for the CLEC Aggregate (July 2001).

## **PMR 5      Replication – 271 Charts**

The replication process calculates the SQM values using BellSouth raw data and compares the KPMG Consulting calculated values to the SQM values depicted on the graphical charts. Three months of replication will be completed for each metric.

The current status of the chart replication is:

### **Month I**

- Fourteen (14) metrics were completed and met the evaluation criteria in Audit II.

- As part of Audit III:
  - One (1) metric (LSR Detail Report) does not require calculations. The report is reviewed by another domain.
  - Three (3) metrics currently do not have values published and are considered placeholders for future reporting.
  - Thirty (30) metrics have met the evaluation criteria and are considered complete.
  - Twenty one (21) metrics have non-matched values and will require retesting.
  - Five (5) metrics have not been started.

#### **Month II**

- Fourteen (14) metrics were completed and met the evaluation criteria in Audit II.
- As part of Audit III:
  - One (1) metric (LSR Detail Report) does not require calculations. The report is reviewed by another domain.
  - Three (3) metrics currently do not have values published and are considered placeholders for future reporting.
  - Twenty-nine (29) metrics have met the evaluation criteria and are considered complete.
  - Three (3) metrics have non-matched values and will require retesting.
  - Twenty-four (24) metrics have not been started.

#### **Month III**

- Fourteen (14) metrics were completed and met the evaluation criteria in Audit II.
- As part of Audit III:
  - One (1) metric (LSR Detail Report) does not require calculations. The report is reviewed by another domain.

- Three (3) metrics currently do not have values published and are considered placeholders for future reporting.
- Twenty-eight (28) metrics have met the evaluation criteria and are considered complete.
- One (1) metric has non-matched values and will require retesting.
- Twenty-seven (27) metrics have not been started.

Overall, this test is currently at 53% complete.

A complete review of the PMR 5 Report for 271 Charts can be seen in the attached document, *V2AuditIII\_PMR5\_271 Charts By Metric Status Summary*. Additionally, a complete review for the PMR 5 for the disaggregated charts can be seen in the attached document *V2AuditIII\_PMR 5\_Chart Replication Status*.

Current outstanding issues are listed on the attached PMR 5 Issue Log attachment *V2AuditIII\_PMR 5\_Chart\_Replication\_IssueLog123101*. This issue log is produced and maintained for the 271 charts replication activities. KPMG Consulting will issue one exception at the conclusion of the test capturing BellSouth issues and resolution activities. The specific replication Non-Matches for the PMR 5 test can be seen in attachment *V2AuditIII\_PMR5\_Replication\_Issues*. This spreadsheet gives the specific issues and non-matched conditions identified in *V2AuditIII\_PMR 5\_Chart\_Replication\_IssueLog123101*

#### **PMR 6 Statistical Analysis For SEEMS**

The Statistical Analysis test is scheduled to lag the Replication test. Analysis of the Statistical methodology is in progress and currently 15% complete.

#### **PMR 7 Enforcement Review of SEEMS**

The Enforcement Analysis calculates the SQM values using BellSouth raw data and compares the KPMG Consulting calculated values to the SQM values used for the Remedy payments. There are three (3) tiers of Metrics to be analyzed for three months.

This test is currently 15% complete.

The current status of the Enforcement Analysis is:

- **Tier I (27 Metrics):**

- Month I:
  - One (1) metric has been matched
  - Two (2) are non-matched.
  - Five (5) are in progress.
  - Nineteen (19) have not been started.
- Month II:
  - Two (2) metrics have been matched.
  - Twenty five (25) have not been started.
- Month III – Not Started
- **Tier II and Tier III Metrics have not been started.**

# **BellSouth-GA OSS Testing Evaluation Interim Status Report**

**(Red-line Version)**

**Revised February 28, 2002**



## **1.0 Document Objective**

In this document, KPMG Consulting, Inc. (KPMG Consulting) provides an interim status report on developments related to the BellSouth-GA OSS Test Master Test Plan (MTP) and Supplemental Test Plan (STP) (Audit I), June, 2000 Interim Metrics (Audit II) and January 2001 Permanent Metrics (Audit III).

## **2.0 Status of ongoing evaluations**

### **Audit I:**

For a complete review of Audit I, see the March 20th, 2001 Final Reports and subsequent status reports. In the GA MTP and STP final reports, KPMG Consulting evaluated 417 420 evaluation criteria in the Metrics test. The Metrics test included a Performance Measure test component for each functional test area of the MTP including Pre-Ordering, Ordering and Provisioning, Maintenance and Repair, and Billing; along with the following six test segments in the STP for the SQM reports:

- PMR 1 -- Data Collection and Storage Verification and Validation;
- PMR 2 -- Metrics Definition Documentation and Implementation Verification and Validation;
- PMR 3 -- Metrics Change Management Verification and Validation;
- PMR 4 -- Metrics Data Integrity Verification and Validation;
- PMR 5 -- Metrics Calculation and Reporting Verification and Validation; and
- PMR 6 -- Statistical Analysis Assessment.

BellSouth has satisfied 408 411 of the 417 420 evaluation criteria for Audit I contained in the MTP and STP Final Reports. The open exceptions associated with the remaining criteria that BellSouth has still not satisfied and that KPMG Consulting is still evaluating are listed below.

**Exception 86 - Percent Provisioning Troubles within 30 days of Service Order Activity** – On Friday, December 28, 2001, KPMG Consulting discussed with BellSouth the discrepancies between the BellSouth-reported values and the KPMG Consulting-calculated values for the BellSouth Retail/CLEC Aggregate SQM reports for September and October 2001. As a result of these discussions, BellSouth determined that some of the instructions in the Raw Data User Manual should be listed in a different order.

BellSouth published an updated Raw Data User Manual on its PMAP web site, which was in accordance with our discussions. BellSouth then

provided KPMG Consulting with the November 2001 Percent Provisioning data (along with the corresponding October 2001 Order Completion Interval data), so that KPMG Consulting could attempt replication on this new data set. The KPMG Consulting-calculated values matched the November 2001 BellSouth-reported values, exactly.

BellSouth provided an updated, amended response to this Exception. Based upon KPMG Consulting's findings, and review of this response, KPMG Consulting is preparing a closure statement for this Exception. (See Evaluation Criteria PMR 5-11-2 which will become satisfied with the closure of Exception 86.)

**Exception 89** - Pre-Ordering OSS Response Interval - While KPMG Consulting has matched the values reported for the New LENS system, we have not yet matched the values for ROS, RNS and TAG.

KPMG Consulting has received, and is reviewing, the early-stage and raw data for the ROS and TAG systems for the months of September and November 2001, respectively. KPMG Consulting also has received the early-stage data for RNS for September 2001, but awaits the corresponding raw data. BellSouth will also provide an amended response to this Exception. (See Evaluation Criteria PMR 4-1-1.)

**Exception 122** - Ordering metrics - use of interface gateway timestamps vs. legacy system timestamps - BellSouth currently is implementing a variety of changes to its systems, such that, in the future, BellSouth will use interface gateway timestamps in its calculation of Reject Interval and FOC Timeliness. At this point, BellSouth estimates that interface gateway timestamps are utilized in the relevant metric calculations more than 95% of the time.

BellSouth has indicated that the related updates to the TAG system were implemented on January 5, 2002 as scheduled, and the remaining EDI system updates will be implemented in May of this year. Once BellSouth has notified KPMG Consulting that all system updates are complete, testing will resume. BellSouth will also provide an amended response to this Exception. (See Evaluation Criteria PMR 2-4-2, PMR 2-4-3, PMR 2-5-2 and PMR 2-5-3.)

**Exceptions 136/137** - KPMG Consulting and BellSouth are currently discussing the data completeness issues relating to raw data files for the Ordering metrics, in particular Reject Interval and FOC timeliness. Focusing on the data for September 6, KPMG Consulting attempted to match the records for these files, first by PON only (to provide a first cut of the analysis). It was determined that the early-stage data set obtained

does not provide all the information necessary to determine which records should be excluded.

KPMG Consulting then repeated our analysis, attempting to match records by OCN/PON/VER. We were not entirely successful. KPMG Consulting has provided BellSouth with lists of discrepancies between the TAG and respective raw data files. BellSouth will provide data from other systems, at the earliest point in which they are recorded, to enable KPMG Consulting to identify exclusions appropriately, and to determine whether the raw data are complete. BellSouth will also provide an amended response to this Exception. (See Evaluation Criteria O&P 7-1-3, O&P 7-2-3, and O&P 7-3-3.)

**Audit II:**

During the evaluation of the original GA test on Performance Metrics (Audit I), the Georgia Commission adopted a set of Interim Measures in June 2000. KPMG Consulting leveraged the work that was underway in Audit I to complete an evaluation of on the Interim Measures (Audit II). Evidence of the leveragability of the work from Audit I to Audit II can be seen in the PMR1 to PMR 6 test sections.

Each PMR test was conducted similarly in Audit I and Audit II, and the results of Audit II are provided under each of the following test sections. The specific similarities are set forth below.

BellSouth has met and satisfied all evaluation criteria for Audit II.

The PMR 5 test for Audit II was specific to the 271 charts that BellSouth produces as the communication vehicle for its state and federal 271 filings. The six test segments of Audit II are:

- PMR 1 -- Data Collection and Storage Verification and Validation;
- PMR 2 -- Metrics Definition Documentation and Implementation Verification and Validation;
- PMR 3 -- Metrics Change Management Verification and Validation;
- PMR 4 -- Metrics Data Integrity Verification and Validation;
- PMR 5 -- Metrics Calculation and Reporting Verification and Validation; and
- PMR 6 -- Statistical Analysis Assessment.

**PMR 1      Data Collection and Storage**

In Audit I, the Test of the Data Collection and Storage Verification and Validation Review evaluated the key policies and practices for collecting and storing raw data necessary for the creation of performance metrics.

The primary objectives of this test were to determine the adequacy and completeness of the key policies and procedures for collecting and storing the performance measurements data.

Audit I results apply to this topic for both existing Service Quality Measurements (SQMs) and for new levels of disaggregation required by the Interim Metrics where the data for the new levels of disaggregation follow the same path as the those previously investigated in Audit I.

For new SQMs, both the procedures followed in, and the tools used to collect and store the data for, the calculation of the reported measures were within scope in Audit II. Therefore the following ~~three (3)~~ five (5) Interim Metrics were reviewed, and the evaluation criteria were all satisfied for the PMR 1 test.

- Pre-Ordering – “Service Inquiry with Firm Order” and “Average Response Time for Loop Makeup Information”  
(KPMG counts manual and electronic LMU as one measure)
- Provisioning - Coordinated Customer Conversions –% Provisioning Troubles Received Within 7 Days of a Completed Service Order
- Change Management - % Change Management Notices Sent on Time and % Change Management Notices – Delay 8 Plus Days

## **PMR 2          Definition Documentation and Implementation**

In Audit I, the Metrics Definition Documentation and Implementation Verification and Validation Review evaluated the overall policies and practices for documenting and implementing metrics definitions. This included policies and practices associated with both CLEC and retail measurements.

The primary objectives of this review were to determine the adequacy, completeness, accuracy, and logic of the performance metrics as documented. Implementation of the definitions in this test covered both the exclusions and business rules applied in the creation of the raw data as well as any exclusions and business rules that were applied in the calculation of the metrics from the raw data.

KPMG Consulting covered the documentation of metric definitions and business rules for 24 existing SQMs in Audit I. Documentation of SQMs not reviewed previously, but included in the Georgia 271 charts, were within the scope of Audit II.

For existing SQMs, where the raw data was of the same format as the data reviewed in Audit I, the implementation of documented business rules and exclusions were covered in Audit I. For new levels of disaggregates, and new SQMs where the raw data was not previously reviewed, the implementation of the business rules and exclusions were within the scope of Audit II.

KPMG Consulting based its evaluations on documentation of SQMs and computational instructions provided by BellSouth. The following 27 metrics were reviewed, and all evaluation criteria were satisfied:

- **Pre-Ordering:**
  - Service Inquiry with Firm Order
  - Average Response Time for Loop Makeup Information (Manual, Electronic)
- **Ordering**
  - Percent Rejected Service Requests
  - Reject Interval
  - Firm Order Confirmation Timeliness
  - LNP – Percent Rejected Service Requests
  - LNP – Reject Interval
  - LNP - Firm Order Confirmation Timeliness
- **Provisioning:**
  - Mean Held Order Interval and Distribution Intervals
  - Percent Missed Installation Appointments
  - Average Completion Interval / Order Completion Interval Distribution
  - Average Completion Notice Interval
  - Coordinated Customer Conversion Intervals
  - Hot Cut Timeliness % Within Interval and Average Interval
  - Coordinated Customer Conversions –% Provisioning Troubles Received Within 7 Days of a Completed Service Order
  - Percent Provisioning Troubles within 30 days of Service Order Activity
  - Total Service Order Cycle Time
  - LNP Percent Missed Installation Appointments
  - LNP Average Disconnect Timeliness
  - LNP Total Service Order Cycle Time

- **Maintenance and Repair**
  - Missed Repair Appointments
  - Customer Trouble Report Rate
  - Maintenance Average Duration
  - Percent Repeat Troubles within 30 days
  - Out of Service > 24 hours
- **Change Management**
  - %Change Management Notices Sent on Time
  - %Change Management Notices Delayed  $\geq$  8 Days

### **PMR 3            Change Management**

In Audit I, the Metrics Change Management Verification and Validation Review evaluated the overall policies and practices for managing changes in BLS's production and reporting of metrics. All of the evaluation criteria for the Audit I PMR 3 test were satisfied.

The assumption for Audit II was that the overall policies and practices for managing changes for the new levels of disaggregation was the same as were verified and validated by Audit I; and, therefore, this area was not covered in the scope of Audit II.

In addition, this review was not considered to be applicable to the newly developed SQMs because no changes have yet been made to these new measures.

### **PMR 4            Data Integrity**

In Audit I, the Metrics Data Integrity Verification and Validation Review evaluated the overall practices and policies for processing the data used by BLS in the production of the reported performance metrics. The objective of this test was to determine the key procedures for processing the data necessary to produce performance metrics and the integrity of the processed data.

For existing SQMs, where the raw data is of the same format as the data reviewed in the Audit I test, the results of Audit I test satisfied the requirements of Audit II.

For new SQMs, and new levels of disaggregates where the raw data had not been reviewed previously, Audit II relied on reviewing the computer script that extracts the raw data, and a review of the extracted data itself to verify that a) the calculations are performed accurately and b) no records are inappropriately included or excluded from the raw data.

Audit II included ~~the same~~ 25 of the metrics listed under the Metrics Definition Documentation and Implementation Verification and Validation Review above (less Coordinated Customer Conversions and Average Completion Notice Interval). All evaluation criteria were met and satisfied for the PMR 4 test.

#### **PMR 5          Calculation and Reporting (271 Chart Replication)**

The Calculation and Reporting Validation Review evaluated the processes used to calculate and report the performance measures as requested in the June 6, 2000 GPSC Docket and reported on the 271 Charts.

The objectives of this test were to determine the accuracy of metrics calculations, and to test for consistency between the reported measures and levels of disaggregates and those requested in the June 6, 2000 GPSC Docket.

KPMG Consulting based all of its evaluations on the raw data provided by BellSouth, or raw data extracted directly from the BellSouth early stage systems, and the computational instructions provided by BellSouth.

The test relied on re-calculating the measures for the CLEC-aggregate and retail analogs, using the raw data provided by BellSouth, and reconciling any discrepancies between BellSouth reported values and the KPMG Consulting calculated values.

The Calculation and Reporting Validation Review included six report areas: Resale, Unbundled Network Elements (UNEs), Local Interconnection Trunks (LITs), Operations Support Systems (OSS), Collocation, and General. Typically, the data included the report months of June 2000, July 2000, and August 2000.

A total of 1178 charts were reviewed, with 1178 charts satisfying the evaluation criteria for a 100% match rate. A complete review of the PMR 5 test can be seen in the attached document, V2Audit II\_PMR5\_StatusSummary. All evaluation criteria for PMR 5 have been met and satisfied.

#### **PMR 6          Statistical Analysis Assessment**

The Statistical Analysis Assessment evaluated the processes and statistical methods employed by BellSouth to evaluate parity of service BellSouth offers to the CLECs relative to the level of service BellSouth provides retail customers. The primary objective was to assess the accuracy and validity of these statistical methods.

The activities undertaken to assess the accuracy and validity of the statistical methods employed by BellSouth included a two-pronged approach. First, in order to assess the validity and appropriateness of the application of the BLS tests, KPMG Consulting evaluated whether or not the mean, rate, or proportion test were applied appropriately to the particular measure. Second, KPMG Consulting evaluated the accuracy of the BellSouth reported standard errors for each of the three types of measures.

The basis for Audit II statistical assessment was a random sample of Provisioning and Maintenance Repair charts chosen from all of the available Georgia 271 charts where the benchmark is an equity measure provided by BellSouth. All evaluation criteria for PMR 6 were met and satisfied.

**Exception 129**

All issues identified in Exception 129 have been resolved and satisfactorily. An amended Exception 129 to reflect the closures will be issued.

**Audit III:**

After the evaluation of the original GA test on Performance Metrics (Audit I) and the audit on Interim Measures (Audit II), the Georgia Commission ordered a set of permanent measures in January 2001. KPMG Consulting leveraged the work that had been completed in Audits I and II to undertake a third audit on the Permanent Measures (Audit III). As can be seen in the following PMR 1 to PMR 65 test sections, each those PMR tests for Audit III is/are being conducted similarly to the Audit I and Audit II tests, and the results and current status of Audit III are provided under each of the appropriate test sections. In Audit III, PMR-6 and PMR-7 apply to SEEMs.

Audits I and II were thoroughly performed and establish a baseline for the review of Audit III since BellSouth continues to use the same systems to produce performance metrics. These systems have been changed over time to the extent necessary to produce new measures and different levels of disaggregation from various sets of metrics that have been ordered by the GA Commission. For a more detailed review of the specific statuses and issues at the metric and disaggregate levels for Audit III, please refer to the attached spreadsheets as referenced in each test section.

**PMR 1      Data Collection and Storage**



As part of Audit III, KPMG Consulting currently is retesting PMR1 by requesting re-verification of documentation and interview summaries to confirm that they are still applicable and correct. Except for capacity management, all tests pertaining to other PMR1 criteria have been completed, and the evaluation criteria satisfied

KPMG Consulting continues to verify documentation and information specifically relating to BellSouth's capacity and capacity plans for collecting and storing data for both the automated and manual processes used for the performance metrics reporting.

This test is currently 90% complete.

## **PMR 2      Standards and Definitions**

KPMG Consulting continues to evaluate metrics definitions and standards documentation, and to review the related policies and practices, through review of the BellSouth OSS Testing Service Quality Measurements Plan, Georgia Performance Metrics and BellSouth's PMAP reports. Three months of reports will be reviewed.

KPMG Consulting continues to examine the SQM document to verify that the measurements accurately represent BellSouth's SQM reporting. KPMG Consulting also is verifying that the PMAP reports are complete and consistent in accordance with the guidelines, and that the reports are available to BellSouth's wholesale customers on a consistent basis. Lastly, KPMG Consulting continues to verify that BellSouth publishes the monthly reports on time.

As of December 28, 2001 the status for each month was:

### **Month I**

- Thirty (30) metrics were completed in Audits I and II, and are thus complete.
- Of the remaining forty four (44) metrics:
  - ~~Forty (40)~~Thirty-seven (37) have been reviewed, met the evaluation criteria and are considered complete.
  - The three (3) Collocation metrics (Average Response Time, Average Arrangement Time and Percent of Due Dates Missed) and FOC Timeliness and Reject Interval are still being reviewed.

- ~~One~~Two metrics, Coordinated Customer Conversions, Average Recovery Time, and Service Order Accuracy, ~~has~~have not been started.

Month I is ~~95~~91% complete.

#### **Month II**

- Thirty (30) metrics were completed in Audits I and II.
- Of the remaining forty four (44) metrics:
  - ~~Thirty-three~~ five (~~33~~5) have been reviewed, met the evaluation criteria and are considered complete.
  - ~~Eight (8)~~Nine (9) metrics (FOC and Reject Response Completeness, ~~Service Order Accuracy~~, Percent Database Update Accuracy, two Bona Fide/New Business Requests, FOC Timeliness and Reject Interval, ~~and three Collocation metrics~~ {Average Response Time, Average Arrangement Time and Percent of Due Dates Missed}) are currently under review.
  - ~~One~~Two metrics, Coordinated Customer Conversions, Average Recovery Time, and Service Order Accuracy ~~has~~have not been started.

Month II is ~~85~~8% complete.

#### **Month III**

- Month III will be started upon completion of Month II testing.

A complete review of the PMR 2 test can be seen in the attached document, *V2Audit III\_PMR2\_Standards\_Status\_Summary*.

#### **PMR 3 Change Management**

KPMG Consulting is retesting Audit I PMR3 from the STP by requesting re-verification of documentation and interview summaries to confirm that they are still applicable and correct.

As a result of our retesting, KPMG Consulting is in the process of issuing draft exceptions on the following issues:

- KPMG Consulting has discovered that BellSouth is not adhering to the documented metrics change control process for tracking changes in TeamConnection. KPMG Consulting